

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Parts 73 and 74 of the)	
Commission's Rules To Establish Rules for)	MB Docket No. 03-185
Digital Low Power Television, Television)	
Translator, and Television Booster Stations)	
And To Amend Rules for Digital Class A)	
Television Stations)	

To: The Commission

COMMENTS OF WATCHTV, INC.

1. Introduction. WatchTV, Inc. ("WatchTV") hereby submits these comments in response to the Commission's Notice of Proposed Rule Making in this proceeding.¹ WatchTV is the licensee of 17 Class A and Low Power Television ("LPTV") Stations operating in the States of Oregon and Washington.

2. Support for CBA. WatchTV has long been an active member of the Community Broadcasters Association ("CBA"), and it supports the comments filed by CBA in this proceeding. These individual comments are intended to highlight some of the issues of particular importance to WatchTV.

3. Single Frequency Networks. WatchTV is interested in and anxious to experiment with new digital technologies. It is especially interested in "single frequency networks," also known as distributed transmitter technology, allowing the simultaneous broadcast of the same signal on the same channel from more than one transmitter location. Class A and LPTV stations

¹ FCC 03-198, released August 29, 2003 and published at 68 FR55566 (September 26, 2003).

should be permitted to experiment with single frequency networks, especially if they are permitted to experiment with standards other than 8-VSB, but even if the use of other standards is not authorized. Distributed transmitter technologies are relatively well developed with standards such as COFDM. WatchTV is interested in exploring the merits of distributed operation and believes that there is a great deal of potential for superior service to the public without creating interference that would result in more preclusion of spectrum use by others than is caused by centralized 8-VSB operation. There is also the potential to provide cost-effective two-way broadband services – another type of operation which WatchTV would like to test.

4. Priority Opportunity for Class A Stations. The application filing process must be managed so as to avoid chaos. WatchTV believes that Class A stations have earned a special place because of the local service they provide² and should be given the first opportunity to apply for second digital channels. The first application window should be limited to Class A applicants. The window need not be a long one; those Class A applicants who are not ready and willing to move into the digital world should have the right to wait, but they should then take their place in line equally with other LPTV and TV translator operators. Alternatively, if the Commission opens an initial window for everyone at the outset, then in case of conflict among applications, Class A applications should take priority.

5. Out-of-Core Channels. Finding second channels will not be easy, and WatchTV believes strongly that out-of-core channels, including both Channels 52-59 and Channels 60-69, must be made available for some period of time. WatchTV had several analog stations licensed

² Class A stations by statute have the greatest local programming requirement of any mass medium. Their full power TV counterparts violate no law or regulation if they have no local programming at all.

out of the core and has managed to migrate them to in-core channels. However, this process took a lot of time and work, to say nothing of the cost. In the digital environment, it may take until some analog channels are returned before some Class A and LPTV stations can find in-core digital channels. The implementation of digital service by these stations should not be delayed, however; and out-of-core channels will be needed during a transitional period to enable the transition to move forward.

6. Class A Primary Status. WatchTV has worked long and hard to earn primary status for many of its stations through Class A qualification. It would be disastrous to erode that status during the digital transition, when the company is being called upon to invest more money in equipment and operational expenses. It is critical that where interference criteria are met, all operations, both analog and digital, be afforded primary status.³ This is not to say that Class A stations should not have to return a channel when full power stations do, but they must not be at risk on channels they are actively using if interference standards are met.⁴

7. Power Limits. The Commission should also re-examine its power limits for Class A and LPTV digital operation. As CBA has pointed out in its comments, it appears that up to 25% of analog power levels will not cause more interference than is caused by analog operation. A reduction to only 10% of analog power is unjustified under those circumstances. Where no

³ It should go without saying that Class A and LPTV stations need to have a second channel during the transition as much or more than full power stations need it, because most do not have cable carriage rights, and they cannot afford to cut off any substantial part of their audience if they offer service with only one technology.

⁴ Where interference standards cannot be met, some Class A stations may have to accept secondary status on a digital channel. However, the primary status of their analog station must be preserved, and they must have the right eventually to move their digital operation to that primary channel.

interference is caused, digital Class A and LPTV stations should be able to replicate their analog coverage areas and even reach further where no harm is done.

8. Conclusion. In sum, Class A and LPTV stations are nimble and should be allowed to explore all flexible options that may result in better service to the public. WatchTV is ready and willing to play an active part in bringing out the potential of digital services. It asks the Commission to give it the widest possible latitude to do so.

Respectfully submitted,

WATCHTV, INC.

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